

Attorney Docket No. SOM92000009US1

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

**Patent Application**

Applicant(s): H. Chen et al.  
Docket No.: SOM92000009US1  
Serial No.: 09/727,491  
Filing Date: December 4, 2000  
Group: 2178  
Examiner: Cong-Lac Huynh

Title: Automatic, Multi-Stage Rich Media Content  
Creation Using a Framework Based Digital  
Workflow - Systems, Methods and Program Products

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**REPLY BRIEF**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313

Sir:

This Reply Brief is submitted in response to the Examiner's Answer dated June 14, 2007 in  
the above-referenced application.

## ARGUMENT

Appellants respectfully disagree with the assertions presented by the Examiner in the Answer for at least the reasons identified below, as well as for those reasons previously set forth in the Appeal Brief.

With regard to the rejection of claims 1, 2, 6, 9-12, 14 and 18 under 35 U.S.C. §103(a) as being unpatentable over Gibbon, Appellants respectfully assert that Gibbon fails to render obvious all of the limitations in claims 1, 2, 6, 9-12, 14 and 18, for at least the reasons presented below.

The examiner contends that Gibbon discloses the incorporation of multimedia assets into a framework as a series of related frames. The Examiner further contends that the slide show icon in the slide show document is equivalent to a thumbnail frame, the video frames are media frames, and the frame-reference transcript is equivalent to the meta frame. Further, the Examiner contends that the frame beginning a slide show is a header frame, and a last frame of a slide show is an end frame. As defined in the specification, and as is commonly known in the art, a meta frame includes a specification of non-media specific information for enablement of hyperlink actions of media contents and for tracking of media interaction. This differs significantly from the transcript of a television program as in Gibbon. As is further defined in the specification, and commonly known in the art, a header frame includes media information containing definition on different media tracks that may be contained in a file. The header frame further includes class name of code that renders immediate type on the client station. Thus, a header frame of a framework is not simply a beginning frame of a slide show as described by the Examiner. Thus, Gibbon fails to teach, suggest or render obvious every element of the independent claims.

The Examiner further contends that Gibbon discloses the combining of multimedia assets and a multimedia description file to create a multimedia repository file executable on a multimedia player. However, Gibbon only discloses the application of a template set to multimedia descriptors resulting in an HTML representation. An HTML representation differs significantly from a multimedia repository file executable on a multimedia player. The Examiner further contends that it would have been obvious to modify Gibbon to include a batch-processing program. In response to previous arguments set forth by the Appellants, the Examiner contends that the transcription text

of Gibbon is equivalent to the description file of the present invention. However, the transcription text provides text for an airing program and does not format multimedia assets. Thus, the Office Action fails to support why it would be obvious to modify Gibbon to include a batch-processing program in light of a template set that creates an HTML representation. Further, Gibbon fails to suggest, disclose or render obvious the combining of multimedia assets and a multimedia description file through a batch-processing program to create of a multimedia repository file that is executable on a multimedia player, as recited in the independent claims of the present invention.

Gibbon fails to disclose the accessing of the single multimedia repository file for creation of a modified multimedia description file in a template, and the accessing of the single multimedia repository file for the creation of a modified multimedia repository file upon combination of the multimedia assets and the modified multimedia description file. Gibbon also fails to disclose the storing of the modified multimedia description file and the modified multimedia repository file as a single modified multimedia repository file on a storage device associated with an authoring session manager. The Examiner contends that these elements are well known, however the Examiner fails to establish an apparent reason for such a modification to Gibbon, and fails to expressly articulate the underlying analysis supporting a proffered “apparent reason.” The Examiner fails to provide some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. The Examiner also fails to identify a reason that would have prompted a person of ordinary skill in the relevant field to modify the elements in the way the claimed new invention does. The Examiner fails to make this rationale explicit and fails to include a detailed explanation of the effects of demands known in the design community or present in the marketplace, and the background knowledge possessed by a person having ordinary skill in the art.

For at least the reasons given above and those previously provided in Appellants' Appeal Brief, Appellants respectfully request withdrawal of the §103(a) rejections of claims 1-6, 9-12 and 14-18. As such, the application is asserted to be in condition for allowance, and favorable action is respectfully solicited.

Respectfully submitted,



Date: June 29, 2007

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